

# The Flood Record

June 2021

## Following a Flood – Permitting Repairs and Substantial Damage (SD) Estimates

Your local floodplain management ordinance requires a permit for the repair or reconstruction of flood damaged buildings. Before those repairs begin, you must determine if the building has been substantially damaged. **SD determinations are a part of your responsibilities under the National Flood Insurance Program (NFIP).**

If a building is substantially damaged, a SD determination letter must be sent to the owner explaining that the building must be brought into compliance with local floodplain regulations. Compliance can include elevation of the building, demolition, relocation of the building outside of the floodplain, or floodproofing for non-residential structures. If the owner carries flood insurance, they may be eligible for \$30,000 in Increased Cost of Compliance coverage to help with the mitigation.

SD is damage of any origin sustained by a structure whereby **the cost of restoring the structure to its before-damaged condition would equal or exceed 50 percent of the market value of the structure before the damage occurred.** Work on structures that are determined to be substantially damaged is considered to be substantial improvement (SI), regardless of the actual repair work performed. If your community cumulatively tracks repairs and improvements over time, add in any previous work as necessary. Also, damage caused by fires or another source can cause SD, requiring a damage estimate and mitigation.

## Post-Flood Damage Assessments- 5 Steps

The State of Illinois [Flood Damage Assessment Packet](#) takes you through five steps to complete the SD determination process:

1. Contact IDNR at 217.782.4428/847.608.3181 or FEMA for advice
2. Complete damage assessments and issue letters
3. Post notices on substantially damaged homes and public notices about your permit rules
4. Provide technical support to the property owners using resources listed below
5. Require permits

Step 2 is where all the work happens. Breaking that task down in to smaller steps includes:

- Mapping - Get out and map the buildings in your floodplain that have flooded. Take pictures of high-water marks, such as debris lines, as soon as possible. Staff in public works or law enforcement can often help get this done while you are organizing the inspections.

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## State of Illinois Flood Damage Assessment Packet

A cooperative effort by:  
Illinois Department of Natural Resources / Office of Water Resources  
Illinois Emergency Management Agency  
Federal Emergency Management Agency



March 2020

Includes Information On:  
Steps to Take Following a Flood  
Substantial Damage Determinations  
Damage Assessment Worksheet  
FEMA Substantial Damage Estimator (SDE)  
Sample Building Notice  
Sample Substantial Damage letter  
Sample Press Release  
Information on mitigation programs



- Windshield Surveys - Once the impacted area has been mapped, a windshield survey can be completed to conduct a quick assessment. Buildings that are severely damaged can be immediately “red tagged” if they are deemed unsafe to enter. A sample red tag is in the Flood Damage Assessment Packet.
- Door-To-Door Assessments - Use the Flood Damage Assessment Packet to complete your estimates. The IDNR/OWR recommends the use of FEMA’s Substantial Damage Estimator software, Version 3.0, and the associated worksheets. Flooding that impacts a small number of structures may be handled by the local floodplain manager and/or building official using estimates by a qualified contractor, a flood insurance adjustor, or a construction cost estimator. Work with the individual property owners to complete the assessments and damage determinations.
- Determine market value of the buildings. Contact your local assessor with an address list and ask for their help.
- Determine percent damage and issue a written SD determination. The Flood Damage Assessment Packet includes an example SD determination letter.
- Require permits to complete repairs, including mitigation if substantially damaged.

### Preparing Before a Flood

Use your community website or newsletters to explain the SD/SI rules to residents so everyone understands the rules and the inspection process. Also explain the SD/SI rules to your public officials before your next flood.

Prepare a filing system for each parcel/address in your floodplain. Use these files to store all the data you will collect for each property including inspection forms, photos, damage estimates, e-mails and letters, records of phone calls or meetings, market value assessment, and permit records. These records will be useful in a future community visit by the state or FEMA to show compliance with the NFIP.

### Resources

In addition to the Illinois Flood Damage Assessment Packet, the state has a [permit packet template](#) to help you work with property owners. Once you have made your damage estimate, the property owner can use the permit packet to refine the cost of repairs. Contact Marilyn Sucoe at [marilyn.sucoe@illinois.gov](mailto:marilyn.sucoe@illinois.gov) for a copies.

FEMA provides guidance to help you complete your damage estimates.

- [Substantial Improvement /Substantial Damage Desk Reference, FEMA P-758](#), (May 2010)
- [Substantial Damage Estimator \(SDE\) User Manual and Field Workbook: Using the SDE Tool to Perform Substantial Damage Determinations FEMA P-784](#), (August 2017)
- [FEMA Substantial Damage Estimator Best Practices](#) (August 2017)

FEMA also has two online courses:

- IS- 284a [Using the Substantial Damage Estimator 3.0 Tool](#)
- IS-285 [Substantial Damage Estimation for Floodplain Administrators](#)

If you are a new local floodplain administer, send any contact updates to Marilyn Sucoe at [marilyn.sucoe@illinois.gov](mailto:marilyn.sucoe@illinois.gov).

### FEMA Independent Study Course: Introduction to Retrofitting Flood-Prone Residential Buildings [IS-279A](#)

This interactive, web based course is designed for floodplain managers, building and zoning officials, and public works engineers to provide essential, nontechnical information about retrofitting existing flood-prone residential structures as presented in the third edition of FEMA P-259, Engineering Principles and Practices for Retrofitting Flood-Prone Residential Structures (FEMA 2012). There are no prerequisites. The course will take about 10 hours to complete and will provide 10 CECs.

The course covers basic retrofitting methods that are appropriate for one- to four-family residential buildings in flood-prone areas (except Zone V), including elevation and covers National Flood Insurance Program (NFIP) policy, regulations, building codes, and standards that govern retrofitting projects

## OWR Permit Staff – Springfield

The floodway permitting staff in Springfield handles floodway permitting for all but the six northeastern counties in the state. Bill Milner is the Downstate Regulatory Section Chief and supervises three permit engineers assigned to the counties as shown on the map. Going from north to south, the floodway permit engineers are Kristian Peterson, William Lavelle, and Jesse Tinch. If you have questions regarding work in a designated floodway or a floodplain with no floodway shown, please send an e-mail to your permit engineer and Bill Milner. Include an address or the latitude/longitude of the proposed development. A copy of the floodplain mapping should also be provided to help speed up their response.

The Springfield permit staff may be reached at [Bill.Milner@illinois.gov](mailto:Bill.Milner@illinois.gov), [William.Lavelle@illinois.gov](mailto:William.Lavelle@illinois.gov), [Kristian.Peterson@illinois.gov](mailto:Kristian.Peterson@illinois.gov), and [Jesse.Tinch@illinois.gov](mailto:Jesse.Tinch@illinois.gov).

## Downstate Floodway Permitting

Remember, regardless of the state's floodway permit requirements, **a local floodplain permit is always required for development in the floodplain, including the floodway.** If an individual state floodway permit is required, you must wait until it has been issued before you issue the local floodplain permit. If the proposed work meets the conditions listed in one of the [13 statewide permits](#), please list the conditions of the statewide permit along with any local floodplain conditions in your approval or require a plan set that shows the conditions have been addressed in the design. Your inspections and final permit close out must include insuring that all statewide permit conditions are met.

## Future Newsletter Topics

If you have floodplain management topics that you would like to see covered in future newsletters, please send your suggestions to Marilyn Sucoe at [marilyn.sucoe@illinois.gov](mailto:marilyn.sucoe@illinois.gov).

